



Justin MacLean
Tel 212.801.3137
Fax 212.309.9537
Justin.MacLean@gtlaw.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/1/2022

October 31, 2022

VIA ECF AND EMAIL

The Honorable Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007
Torres_NYSDChambers@nysd.uscourts.gov

Re: *Ultra International Music Publishing, LLC v. Kanye West individually and d/b/a "Yeezy Tech," et al.*, Case No. 1:22-cv-05560 (AT)

Dear Judge Torres:

We currently represent Defendant Ye, formerly known as Kanye West, individually and d/b/a "Yeezy Tech" ("Ye") in the above-captioned action. Pursuant to Sections I.B. and I.C. of Your Honor's Individual Practices, and for good cause, we write to request a thirty-day extension of time for Ye to respond to the Complaint filed by Plaintiff Ultra International Music Publishing, LLC ("Plaintiff"). This is each Ye's fourth request for an extension of time to respond to the Complaint. The Court has granted all of Ye's previous requests. *See* Dkt. 23, 28, 33. Plaintiff, through counsel, has indicated that it does not take a position with respect to the requested extension, and neither consents nor objects to Ye's request.

Ye's current deadline to respond to the Complaint is November 2, 2022. Ye respectfully requests a 30-day extension of this deadline, to December 2, 2022. Although the Court has ordered that "no further extensions shall be granted absent good cause shown" (Dkt. 33), we respectfully submit that such good cause exists here.

As indicated in the parties' October 28, 2022 joint letter to the Court, Greenberg Traurig, LLP ("GT") intends to move to withdraw as counsel for Ye, due to recent events and GT's inability to reach Ye or his representatives. In particular, Ye has recently publicly made improper antisemitic remarks, resulting in his condemnation by and disassociation from various entities. Because his prior management is no longer a part of or affiliated with Ye, GT has been unable to meaningfully communicate with him in order to represent him in this matter, including in connection with finalizing and filing Ye's response to the Complaint. GT has been diligent in moving for the requested stay, and will have been diligent in moving to withdraw, as soon as reasonably possible after determining that communicating with Ye in connection with the matter and his response to the Complaint is no longer practically feasible. Moreover, we respectfully

October 31, 2022

Page 2

submit that no party will suffer prejudice if the extension is granted. The Court entered a scheduling order only today; the fact discovery deadline is not until February 24, 2023, the expert discovery deadline is not until April 17, 2023, and no trial date has been set.

We thank the Court for its attention and courtesies.

Respectfully Submitted,



cc: Counsel of Record

GRANTED. By **December 2, 2022**, Defendant Kanye West shall respond to the complaint. No further extension shall be granted absent a showing of good cause.

SO ORDERED.

Dated: November 1, 2022
New York, New York



ANALISA TORRES
United States District Judge